

**THE ROSEN LAW FIRM, P.A.**

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*[Proposed] Lead Counsel for Lead Plaintiff and Class***UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

ROBERT GLICK, Individually and On Behalf  
of All Others Similarly Situated,  
Plaintiff,

v.

ARQIT QUANTUM INC. F/K/A CENTRICUS  
ACQUISITION CORP., DAVID WILLIAMS,  
NICK POINTON, CARLO CALABRIA,  
STEPHEN CHANDLER, MANFREDI  
LEFEBVRE D'OVIDIO, VERALINN  
JAMIESON, GARTH RITCHIE, AND  
STEPHEN WILSON,

Defendants.

**CASE No.: 1:22-cv-02604-PKC-MMH****NOTICE OF MOTION OF JUSTIN  
PODBIELSKI TO: (1) APPOINT LEAD  
PLAINTIFF; AND (2) APPROVE LEAD  
PLAINTIFF'S SELECTION OF  
COUNSEL****CLASS ACTION**

**PLEASE TAKE NOTICE** that pursuant to Section 21D of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), Plaintiff Justin Podbielski ("Movant") hereby moves this Court, the Honorable Pamela K. Chen, United States District Court Judge, on a date and at a time to be designated by the Court, for an order:

- (a) appointing Movant to serve as Lead Plaintiff in this action; and
- (b) approving Movant's selection of The Rosen Law Firm, P.A. as Lead Counsel for the Class.

In support of this Motion, Movant submits: (i) the Memorandum of Law dated July 5, 2022 (and exhibits); and (ii) a [Proposed] Order Appointing Lead Plaintiff and Approving Lead Plaintiff's Selection of Counsel.

Movant is aware of your Honor's Individual Rule 3.D., the Bundling Rule, which generally encourages parties refrain from the filing of motion papers prior to their full briefing. The Exchange Act requires that lead plaintiff motions be filed no later than 60 days after the date notice of the action was first published and, in this case, the first notice of the action was published on May 6, 2022; accordingly, lead plaintiff motions must be filed no later than today, July 5, 2022. *See* 15 U.S.C. §78u-4(a)(3)(A)(i)(II). As the filing of the lead plaintiff motion is statutorily mandated by the 60-day time limit, Movant respectfully requests that the Bundling Rule be waived.

Movant is aware of Your Honor's Individual Rule 3.A. which generally requires a pre-motion conference prior to filing many motions. Due to the PSLRA's lead plaintiff procedure, however, Movant does not yet know which other entities or persons plan to move for appointment as lead plaintiff until after all the movants have filed their respective motions. As such, Movant respectfully requests that the pre-motion conference requirement be waived. The filing of the lead plaintiff motion will give notice to the other lead plaintiff movants, whose identities Movant cannot know at this time and therefore cannot serve, that other class members have moved for lead plaintiff appointment.

Dated: July 5, 2022

Respectfully submitted,

**THE ROSEN LAW FIRM, P.A.**

/s/ Phillip Kim

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*[Proposed] Lead Counsel for Lead Plaintiff  
and Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 5, 2022, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/Phillip Kim